

# ***NORTH SHORE SANITARY DISTRICT***

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March 9, 2012

Mike Joyce  
Superfund Community Involvement Coordinator  
US EPA Region 5  
77 W. Jackson Blvd. (SI-7J)  
Chicago, IL 60604-3590

RE: Public Comment on Johns Manville Site Cleanup

Dear Mr. Joyce:

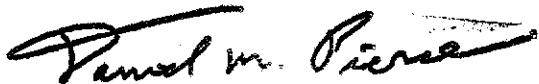
The following public comment regarding the proposed Johns Manville asbestos cleanup project is hereby submitted by the North Shore Sanitary District. The District was organized pursuant to the North Shore Sanitary District Act of 1911 to protect Lake Michigan, the primary source of drinking water for millions of Americans. The North Shore Sanitary District is the 2<sup>nd</sup> largest sanitary district in Illinois, providing vital wastewater treatment services to over 300,000 people in Lake County. The District owns and operates three state-of-the-art sewage treatment plants, 11 pumping stations, a sludge recycling facility and over 125 miles of interceptor sewers. Communities served include Waukegan, Highland Park, North Chicago, Gurnee, Zion, Winthrop Harbor, Lake Forest, Lake Bluff, and others. The District also provides its valuable services to the Great Lakes Naval Training Center.

The District supports the USEPA's plan to clean up areas contaminated with asbestos in the area near the Johns Manville and Commonwealth Edison properties in Waukegan, IL. The District also understands and shares the concerns regarding maintenance workers' exposure to asbestos-containing materials while servicing utility lines in these areas. However, we strongly object to USEPA's position in the proposed cleanup plan that the need for access and repair to sewer lines at Site 4/5 appears to be much lower than other utilities and that immediate action is not necessary in the event of damage to or failure of sanitary sewer lines located within Site 4/5. The two District sanitary sewer lines located in Site 4/5 are large diameter (39" & 48") interceptor sewers with a combined capacity of approximately 40 MGD. The interceptors convey raw sewage from Waukegan, Zion, Beach Park and Winthrop Harbor to the District's Waukegan Sewage Treatment Plant. Any damage or failure of these lines would result in significant and immediate environmental and public health concerns for this area, and would therefore require an immediate response to correct the situation.

The District strongly supports and recommends that USEPA implement it's recommended clean up approach presented in Alternative 5, which includes modified Alternative 2 for Site 4/5 with the provision that a clean corridor is provided for all utility lines in the area, including the District's interceptor sewers. This plan would achieve the overall objective for the cleanup and essentially eliminate the potential for release of or direct contact with asbestos containing material.

Please contact our office if you have any questions or would like more information regarding the District's position on this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel M. Pierce". The signature is fluid and cursive, with a long horizontal stroke at the end.

Daniel M. Pierce

President

NORTH SHORE SANITARY DISTRICT

C: Board of Trustees  
Brian Dorn, General Manager